Ted Fitzgerald
<TFitzgerald@tu.org>
08/04/2005 11:44 AM

To Peter Stevenson/EPR/R8/USEPA/US@EPA
cc Laura Hewitt <LHewitt@tu.org>, Leon Szeptycki <LSzeptycki@tu.org>
bcc
Subject AFC 8/4/05

Pete.
I was in AFC last week with some more FS and a USGS rep. They are looking at doing another tracer study of the river to see what differences have occurred since the FS project in 2003.
While there, we reviewed the Pacific Mine situation with the aluminum. I want to kick around a idea or two with you that surfaced during that discussion. We talked about the idea of directing the seeps into the oxiation ponds per our earlier conversation. An opinion was raised that it would be good if the aluminum was precipitated out and deposited on the uplands rather than taking it directly into a water course. As we witnessed this wet year, the aluminum settles quickly to the bottom of a stream course but does travel some distance along the stream. This year the precipitated aluminum went for about 50 feet and probably would have gone further had not the seeps dried up. On a wetter year we could expect a prolonged effect from the Al seeps.
We definitely want to keep the precipitate from reaching the river and as you noted, our best safeguard against that happening is making the Al bearing water pass through the oxidation ponds. But if possible I would like to keep the Al from even getting that far. So here is what I propose:
Instead of cutting a channel to intercept the seeps and directing it into the upper pond, I propose that I construct a small detention pond in the area where you took the sludge sample. I am talking about a pond that would be maybe a foot deep with a surface area of about 100 sq. ft. The material removed to create the pond would be placed on the downhill side to form a dike to help hold and direct the water from the seeps. The outflow from the pond would be directed as you suggested into the upper oxidation pond but hopefully the Al will settle out in the retention pond and never reach the oxidation ponds.
This is a minor modification to what you and I talked about doing but I think it is a better plan. Do you concur?
Last week I also took a grab sample from the borrow area. It is at AWAL in SLC for testing. I should have the results back by next week. I will forward you copies of the test results to see if you see any red flags. I am hopeful that the soil will be inert. I did not sample topsoil but dug through the surface soils to the substrate below in a half dozen random locations around the borrow area. That material should be somewhat representative of the cover material I plan to place on the repository, recognizing that the borrow area will be several feet deep before we get enough material to complete the job.
Kathy Zirbser from FS Regional Office was on the field trip. I talked to her about me using the FS's XRF during this project. She was fine with that plan which is good since her office paid for the machine.
Have you gotten any water or soil samples back on the samples you took?
TU has provided comments back to Matt Cohn on the third draft of the AOC. My counsel thinks we are very close and could have agreement in a couple of weeks but that assumes it will clear EPA's management review by then. That may be optimistic but if there is much more delay I may not have time to get a contractor and do any work this season. I am quickly losing field time in the upper reaches of AFC.
Have you heard any more about the ARAR's?
Later,
Ted